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Attorneys for Defendant, COUNTY OF  
RIVERSIDE, SHAWN HUBACHEK and  
JIMMIE MCGUIRE

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

S.L. a minor by and through the  
Guardian Ad Litem Kristine Llamas  
Leyva, individually and as successor-in-  
interest to JOHNNY RAY LLAMAS,  
deceased; V.L., by and through the  
Guardian Ad Litem Amber Sietsinger,  
individually and as successor-in-interest  
to JOHNNY RAY LLAMAS deceased;  
and CAROLYN CAMPBELL,  
individually,

Plaintiffs,

v.

COUNTY OF RIVERSIDE; SHAWN  
HUBACHEK; JIMMIE MCGUIRE;  
and DOES 3–10, inclusive,

Defendant.

Case No.: 5:24-cv-00249-CAS(SP<sub>x</sub>)  
Hon. Christina A. Snyder

**KAYLEIGH ANDERSEN'S  
DECLARATION IN SUPPORT OF  
DEFENDANTS' MOTION TO STAY**

*Filed concurrently with Notice of  
Motion and Memorandum of Points and  
Authorities; and Proposed Order*

Date: Monday, September 15, 2025  
Time: 10:00 am  
Crtrm.: Courtroom 8D\_\_

Action Filed: 02/01/2024

**DECLARATION OF KAYLEIGH ANDERSEN**

I, Kayleigh Andersen, declare as follows:

1. I am an attorney at law duly authorized to practice before all the courts of the State of California and in all of the United States District Courts within the Central District of California. I am a partner in the law firm of Manning & Kass, Ellrod, Ramirez, Trester LLP, attorneys of record herein for Defendants COUNTY OF RIVERSIDE, SHAWN HUBACHEK, and JIMMIE MCGUIRE (collectively “Defendants”). If called and sworn as a witness to testify, I am competent to testify and would testify from my own personal knowledge as to the facts set forth in this declaration, except as to those matters that are stated on information and belief herein.

2. On July 31, 2025, I reached out to Plaintiffs’ counsel by e-mail, requesting a stipulation between the parties for a stay on the district court proceedings. Attached hereto as Defendants’ **Exhibit A** is a true and correct copy of the e-mail conversation between counsel, which took place on July 31, 2025.

3. The following day, August 1, 2025, the parties conferred by telephone. While Defendants proposed a stay of all proceedings, Plaintiffs proposed a stay on the federal claims, only, to allow the case to proceed to trial on the state law claims on the current trial date. However, an agreement regarding a stay could not be reached.

I declare under penalty of perjury under the laws of the United States, that the foregoing is true and correct.

Executed on August 13, 2025 in San Bernardino, California.

/s/ Kayleigh Andersen  
Kayleigh Andersen

## **EXHIBIT A**

**From:** Benjamin Levine <blevine@galipolaw.com>

**Sent:** Thursday, July 31, 2025 3:34 PM

**To:** Kayleigh Andersen <Kayleigh.Andersen@manningkass.com>

**Cc:** Eugene P. Ramirez <Eugene.Ramirez@manningkass.com>; Lynn Carpenter <Lynn.Carpenter@manningkass.com>; Shanika Linear <Shanika.Linear@manningkass.com>; Delia Flores <Delia.Flores@manningkass.com>; Dale K. Galipo <dalekgalipo@yahoo.com>; Santiago Laurel <slaurel@galipolaw.com>

**Subject:** Re: Llamas (PC) Stay

Good afternoon Kayleigh,

Although we do not believe Defendants' interlocutory appeal is proper given the disputed issues of fact that the district court found preclude qualified immunity on summary judgment, we will stipulate to a stay of the district court proceedings as to the federal claims during the pendency of the appeal. We will not stipulate to a stay as to the state law claims, and we intend to proceed to trial on those claims if the case does not settle at our upcoming mediation.

Relatedly, Defendants' Mediation Questionnaire submitted in the Ninth Circuit indicates that Defendants intend to appeal the district court's entire summary judgment order, including the rulings addressing standing, which are not subject to interlocutory appeal. If the case does not settle at mediation, we also intend to seek dismissal of the appeal, at least insofar as it seeks to appeal these ancillary rulings.

Given that our mediation date is after the current ADR cutoff, a stipulation to continue that deadline (as well as the August 18 status conference re settlement) makes sense. Please feel free to circulate a draft stipulation or let me know if you would prefer that we prepare one.

Best,  
Ben

**Benjamin S. Levine, Associate Attorney | The Law Offices of Dale K. Galipo** | 21800 Burbank Blvd., Suite 310, Woodland Hills, CA 91367 | Office: +1.818.347.3333 | Fax: +1.818.347.4118 | Email: [blevine@galipolaw.com](mailto:blevine@galipolaw.com) [www.GalipoLaw.com](http://www.GalipoLaw.com)

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**From:** Kayleigh Andersen <[Kayleigh.Andersen@manningkass.com](mailto:Kayleigh.Andersen@manningkass.com)>  
**Sent:** Thursday, July 31, 2025 10:51 AM  
**To:** Benjamin Levine <[blevine@galipolaw.com](mailto:blevine@galipolaw.com)>  
**Cc:** Eugene P. Ramirez <[Eugene.Ramirez@manningkass.com](mailto:Eugene.Ramirez@manningkass.com)>; Lynn Carpenter <[Lynn.Carpenter@manningkass.com](mailto:Lynn.Carpenter@manningkass.com)>; Shanika Linear <[Shanika.Linear@manningkass.com](mailto:Shanika.Linear@manningkass.com)>; Delia Flores <[Delia.Flores@manningkass.com](mailto:Delia.Flores@manningkass.com)>; Dale K. Galipo <[dalekgalipo@yahoo.com](mailto:dalekgalipo@yahoo.com)>; Santiago Laurel <[slaurel@galipolaw.com](mailto:slaurel@galipolaw.com)>  
**Subject:** RE: Llamas (PC) Stay

Good morning Ben,

We have a number of pressing pre-trial deadlines coming up. Would your office stipulate to a stay of proceedings pending the 9<sup>th</sup> circuit appeal? We still have the mediation on September 10, which is after the current ADR cut-off, so a stipulation to stay or at the very least continue dates appears necessary. I am happy to discuss further at your convenience.

Thank you,  
Kayleigh

**Kayleigh Andersen**

Partner



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**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 801 S. Figueroa St, 15th Floor, Los Angeles, CA 90017-3012.

On August 14, 2025, I served true copies of the following document(s) described as **DEFENDANTS' NOTICE OF MOTION AND MOTION TO STAY THE DISTRICT COURT PROCEEDINGS; MEMORANDUM OF POINTS AND AUTHORITIES** on the interested parties in this action as follows:

**Electronic Mail Notice List**

The following are those who are currently on the list to receive e-mail notices for this case.

- **Kayleigh Ann Andersen**  
kayleigh.andersen@manningkass.com, delia.flores@manningkass.com
- **Lynn Louise Carpenter**  
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lmarks@garolaw.com, tdockweiler@garolaw.com, daniel@garolaw.com
- **Eugene P Ramirez**  
Eugene.Ramirez@manningkass.com, delia.flores@manningkass.com

**BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on August 14, 2025, at Los Angeles, California.

/s/ Sandra Alarcon  
Sandra Alarcon